

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALLEY HEALTH SYSTEM, LLC, a
Delaware Limited Liability company, DVH
HOSPITAL ALLIANCE, LLC, a Delaware
Limited Liability company, and
SUMMERLIN HOSPITAL MEDICAL
CENTER, LLC, a Delaware Limited Liability
company,

Plaintiff,

v.

TRAVEL INSURANCE FACILITIES, PLC, a
Foreign Corporation, UNION
REISEVERSICHERUNG
AKTIENGESELLSCHAFT, a Foreign
Corporation,

Defendant.

CASE NO.: 2:22-cv-00365-ART-DJA

ORDER GRANTING

STIPULATION TO EXTEND
PLAINTIFFS' DEADLINE TO FILE
OPPOSITIONS TO DEFENDANTS'
MOTIONS TO DISMISS

(FIRST REQUEST)

Defendants TRAVEL INSURANCE FACILITIES, PLC and UNION
REISEVERSICHERUNG AKTIENGESELLSCHAFT ("Defendants") and Plaintiffs VALLEY
HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL
MEDICAL CENTER, LLC ("Plaintiffs"), by and through their counsel of record, hereby
stipulate, agree, and request that the deadline for Plaintiffs to file oppositions to Defendants'
Motions to Dismiss (ECF Nos. 24 and 56) be extended by two weeks, up to and including
September 20, 2023.

Defendants filed Motions to Dismiss requesting dismissal primarily due to a lack of
personal jurisdiction. ECF Nos. 24 and 56. Plaintiffs requested leave to conduct limited

1 jurisdictional discovery relevant to the issue of personal jurisdiction, which the Court
2 granted on July 12, 2023. ECF No. 68. The Court provided Plaintiffs until September 6,
3 2023 to file oppositions to Defendants' Motions to Dismiss. *Id.*

4 Plaintiffs served Jurisdictional Interrogatories on both Defendants on July 13, 2023.
5 Defendants' responses were initially due on August 14, 2023, which would provide Plaintiffs
6 approximately three weeks thereafter to prepare their Oppositions to Defendants' Motions
7 to Dismiss.

8 Defendants require additional time to gather information responsive to Plaintiffs'
9 Jurisdictional Interrogatories, which has proved difficult thus far due to the nature in which
10 information is tracked in Defendant TIF's claims management system. Defendants
11 requested a two-week extension to August 28, 2023 to allow sufficient time to respond to
12 Plaintiffs' Jurisdictional Interrogatories, to which Plaintiffs agreed.

13 To maintain sufficient time for Plaintiffs to prepare their Oppositions to Defendants'
14 Motions to Dismiss, the parties hereby request that the deadline for Plaintiffs to file the
15 Oppositions be extended to September 20, 2023.

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17 *[signature page to follow]*
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The stipulation is made in good faith and not for purposes of delay.

McDONALD CARANO LLP

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By: /s/ Timothy M. Hartley

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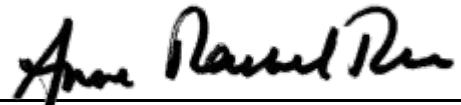
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Attorneys for Plaintiffs

IT IS SO ORDERED.

DATED: August 14, 2023



Anne R. Traum

United States District Court Judge